## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

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DOMINICK P. CAROLLO, STEVEN E. GOLDBERG, and PETER S. GRIMM.

Defendants.

JNITED STATES OF AMERICA

v.

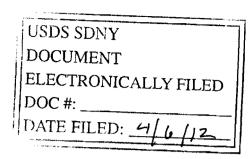
PETER GHAVAMI

(aka PETER GHAVAMILAHIDJI),

GARY HEINZ, and

MICHAEL WELTY,

Defendants.



S1-10-CR-654 (HB)

1:10-CR-01217 (KMW)

## PROPOSED ORDER TO SEAL DOCUMENTS

THIS MATTER having been brought before the Court on Privilege Claimant 8's application for entry of an Order to File Under Seal briefs and declarations in opposition to the United States Application for an Order disclosing to the defendants portions of memoranda interview that are claimed by third parties to be attorney client privilege product, filed by the United States on March 15, 2012, and the Court having found that there are legitimate confidentially concerns which warrant the relief sought, and for good cause shown, it is on this 6, day of April 2012.

04/ 00/ E016 10,00 1777 (0.00 1777 ) 04/ 007/ 000

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ORDERED that the application to seal is GRANTED, and it is ORDERED that briefs and declarations in support thereof, are sealed.

United States Magistrate Judge

James C. Francis IV